

## **TABLE OF CONTENTS**

PRELIMINARY STATEMENT .....	1
FACTUAL AND PROCEDURAL HISTORY.....	2
LAW AND ARGUMENT.....	3

### **POINT I**

THE UNDERLYING CASE WAS PROPERLY BROUGHT IN QUEENS COUNTY.....	3
--	---

### **POINT II**

THE REMOVAL WAS UNTIMELY.....	3
-------------------------------	---

### **POINT III**

THE MOVING DEFENDANTS DID NOT RECEIVE THE CONSENT OF DEFENDANT SAHIB S. WALIA AND SO THE REMOVAL WAS IMPROPER.....	4
--	---

### **POINT IV**

THE PLAINTIFF HAD AT INCEPTION, AND HAS TODAY, A GOOD FAITH BASIS UNDER CONTROLLING NEW YORK PRECEDENT TO MAINTAIN THIS ACTION IN STATE COURT.....	4
--	---

### **POINT V**

THERE IS NO POSSIBLE GROUNDS FOR FEDERAL JURISDICTION AS LONG AS DEFENDANT SAHIB S. WALIA REMAINS IN THE CASE.....	6
--	---

### **POINT VI**

THE REMOVAL WAS FRIVOLOUS, AND AS SUCH COSTS ARE APPROPRIATE....	7
--	---

CONCLUSION.....	7
-----------------	---